

# MEMO ENDORSED



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January 21, 2020

## VIA ECF

Hon. Edgardo Ramos, U.S.D.J.  
United States District Court for the Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Deitrick v. Cibolo Capital Partners I, LLC and TG LLC*, No. 1:17-cv-04165-ER  
(S.D.N.Y.)

Dear Judge Ramos:

We represent Defendants Cibolo Capital Partners I, LLC (“Cibolo”) and TG LLC (“TG”) (collectively, “Defendants”) in connection with the above-referenced action. In accordance with Section 1(E) of Your Honor’s Individual Practices, we respectfully submit this letter-motion for extension of time to submit the parties’ joint declaration concerning the citizenship of the members of the defendant entities, as required by the Court’s Order dated January 16, 2020.

In the January 16, 2020 Order, the Court ordered the parties to submit a joint declaration listing the membership and citizenship of the defendant entities by 12 p.m. on Tuesday, January 21, 2020, so that the Court can assess the diversity of the parties and assure that it can exercise subject matter jurisdiction over this action. Doc. 56. Upon receipt of the Order, the parties immediately engaged in communications regarding the declaration and have pursued diligent efforts to obtain the necessary information. The parties have confirmed the members and citizenship of TG, and their Joint Declaration on the membership and citizenship of that entity is forthcoming.

However, despite their diligent efforts, Defendants have not been able to confirm the membership and citizenship of Cibolo, as it requires obtaining information from entities that are not in Defendants’ control. As a result, Defendants respectfully request a brief extension of time to submit a declaration providing the remaining information regarding Cibolo. Plaintiff consents to an extension of the deadline until Friday, January 24, 2020.

This is the parties’ first request for an extension of the deadline set by the Court’s January 16, 2020 Order, and the requested extension will not impact any other deadlines in this matter.

Respectfully,

/s/ Marc D. Katz

Marc D. Katz

Cc: Counsel of Record (via ECF)

The application is   X   granted  
   denied

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos'.

Edgardo Ramos, U.S.D.J.

Dated: Jan. 21, 2020

New York, New York